

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV 16 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM Docket No. 93-254

In the Matter of)

Limitations on Commercial Time on)
Television Broadcast Stations)

To the Commission:
STOP CODE 1800D

MOTION FOR EXTENSION OF TIME

Silver King Communications, Inc. ["SKC"]^{1/}, by its attorneys, herewith moves the Commission to extend the due date for comments in the above-captioned proceeding until December 20, 1993, and the due date for reply comments until January 5, 1993. The following is shown in support of this request:^{2/}

The Notice of Inquiry^{3/} in this proceeding seeks comments on the significant public interest issues raised by the possible reimposition of limits on the amount of commercial matter which television stations may air. The

1/ SKC is the parent of twelve television stations, all of which have a home shopping entertainment format. Should the Commission reestablish commercial limits for television stations, SKC's stations would have to drastically alter their mode of operation. SKC's interest in the outcome of this proceeding is substantial and obvious.

2/ Counsel for the National Association of Broadcasters, which intends to participate in this proceeding, has indicated NAB's support for grant of this request.

3/ Notice of Inquiry, MM Docket No. 93-254 (October 7, 1993).

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issues it raises are complex and far reaching in their constitutional and operational implications.

In order to ensure the Commission of an optimally complete record upon which to premise its decision, several studies have been commissioned for submission in the rulemaking. Those studies are currently underway. However, SKC does not anticipate that they can be finished by the present November 29, 1993, comment deadline: rather, completion is presently expected sometime during the first two weeks of December. The requested extension will permit evaluation of the studies' results and their incorporation into SKC's comments.

It should be noted that the Notice of Inquiry seeks to revisit the Commission's Television Deregulation^{4/} decision. Reflecting the complex nature of the issues presented, that proceeding had a lengthy initial comment period, which the Commission extended in order to ensure thorough consideration of the public interest ramifications of its decision.^{5/} Many of the issues resolved by

4/ Report and Order, MM Docket No. 83-670, 98 FCC 2d 1076 (1984), recons. denied, 104 FCC 2d 357 (1986), aff'd in part and remanded in part sub nom., Action for Children's Television v. FCC, 821 F.2d 741 (D.C. Cir. 1987).

5/ The initial Notice of Proposed Rule Making in that proceeding was adopted on June 29, 1983, and specified a comment date of November 2, 1983 and a reply date of December 19, 1983; these dates were subsequently extended to November 21, 1983, and January 5, 1984. Following remand,
(continued...)

Television Deregulation are also present here. Any consideration of a possible return to pre-deregulatory policies demands the opportunity for an equally thorough review of relevant issues.

In sum, the Notice herein initiates proceedings which could have a significant impact on the regulatory environment in which the television industry operates. Given the potential scope of that impact, it is incumbent on the Commission to proceed on the basis of an optimally complete record. The brief three-week extension SKC requests -- which will still result in a comment period substantially shorter than that which preceded Television Deregulation -- will permit compilation of such a record.

Respectfully submitted,

SILVER KING COMMUNICATIONS, INC.

By 

John R. Feore, Jr.

DOW, LOHNES & ALBERTSON
1255 - 23rd Street, N.W.
Suite 500
Washington, D.C. 20037
(202) 857-2500

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5/ (...continued)
the initial comment and reply dates of January 4 and February 18, 1988, were extended to February 19 and April 4, 1988.